

# EXHIBIT 11

# Ronaldo's lawyer says rape allegations are 'fabrications'

... Ronaldo is being sued by a woman who says he raped her in a hotel in Las Vegas in 2009

Wed, Oct 10, 2018, 20:57



Cristiano Ronaldo's newly-appointed Las Vegas lawyer has labelled allegations of rape against the Juventus forward as "complete fabrications" and said what occurred was "consensual in nature".

Ronaldo is being sued by a woman in the United States, who claims he raped her in the penthouse suite of a Las Vegas hotel in 2009.

The Portugal international, 33, has firmly denied the allegations, saying it "goes against everything that I am and believe in".

The woman also alleges the former Manchester United player dispatched a team of "fixers" to obstruct the criminal investigation and trick her into keeping quiet for \$375,000 (€325,000).

Speaking to reporters in Nevada last week, lawyer Leslie Stovall said the woman suffers from depression and post-traumatic stress linked to the alleged incident, and was encouraged to launch legal action after seeing others do the same as part of the #MeToo movement.

Ronaldo was left out of Portugal's squad for their forthcoming matches against Poland and Scotland, but continues to have the full support of both club and country.

On Wednesday, Nevada attorney Peter S Christiansen issued a lengthy statement in response to the "inflammatory accusations" lodged against his client.

"To be clear, Mr Ronaldo vehemently denies all of the allegations in the complaint and has consistently maintained that denial for the last nine years," Christiansen said on gestifute.com.

"The documents which purportedly contain statements by Mr Ronaldo and have been reported in the media are complete fabrications."

Christiansen added material "irresponsibly published" from "stolen documents" included large sections which were "altered and/or completely fabricated".

The statement continued: "To absolve any doubt, Mr Ronaldo has always maintained, as he does today, that what occurred in 2009 in Las Vegas was consensual in nature.

"While Mr Ronaldo does not deny the existence of the mutual agreement and release, his motivations for agreeing to that resolution have been twisted to say the least.

"Far from any admission of guilt or any ulterior motive, Mr Ronaldo was advised to privately resolve the allegations against him in order to avoid the inevitable attempts that are now being made to destroy a reputation that has been built upon hard work, athleticism and honour.

"Unfortunately, he now finds himself embroiled in the type of litigation that is all too commonplace in America."

... Christiansen's statement concluded: "Mr Ronaldo will leave future discussion of any and all legal matters to his attorney: here and in Europe.

"He is confident that the truth will survive this frenzy and the laws of Nevada will be upheld and enforced."

Ronaldo was suspended for the recent Champions League tie against Swiss side Young Boys, but returned to action for the Serie A leaders against Udinese on Saturday, scoring in the 2-0 victory.

Meanwhile, US sportswear firm Nike, which reportedly has a €879million commercial deal with Ronaldo, said in a statement that it is "deeply concerned by the disturbing allegations" and "will continue to closely monitor the situation".

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## Ronaldo's lawyer: 'Rape allegation documents altered and fabricated'



11 October at 09:45

Peter S. Christiansen, the lawyer that will follow the Cristiano Ronaldo rape accusation has released an official statement with Gestifute, the agency founded and managed by Ronaldo's lawyer Jorge Mendes.

Ronaldo has been accused by former American model Kathryn Mayorga of raping her in summer 2009. The statement of Ronaldo's lawyer claims that the documents signed by Ronaldo have been "manipulated or fabricated ex novo."

"The sexual relations between Ronaldo and Mayorga were absolutely consensual and the confidentiality agreement that followed does not in any way imply an admission of guilt by Ronaldo."

"Cristiano deny all the allegations, documents used by media are made up. In 2015 dozens of

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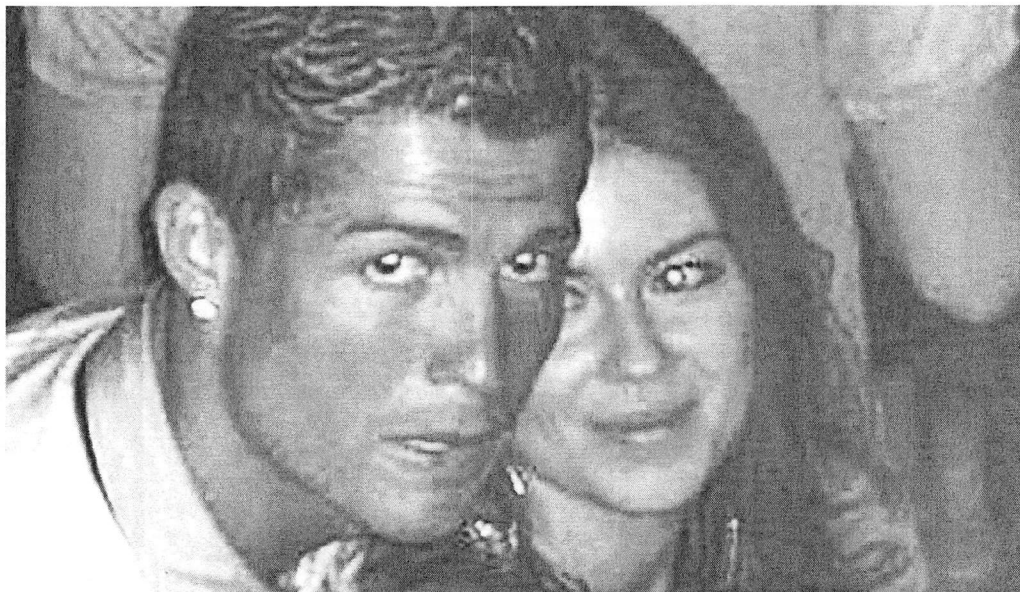


Although Cristiano Ronaldo is accustomed to the constant attention of the media, inherent in the fact that he is a well-known person, it is absolutely deplorable that certain media continue to propagate and stimulate a deliberate campaign of defamation based on stolen and easily digital manipulating documents."

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English Site > World > Football > Ronaldo Lawyers Develop Defense Strategy on Rape Allegations

### Rape Allegations

## Ronaldo's Defense Team Develops a Strategy

It took two weeks, but the legal team seeking to defend Cristiano Ronaldo against rape allegations levelled by Kathryn Mayorga has now settled on a defense strategy. They are seeking to cast doubt on information published by DER SPIEGEL. *By DER SPIEGEL Staff*



Soccer star Cristiano Ronaldo



October 11, 2018 06:55 PM

Print Feedback Comment

Cristiano Ronaldo has formed a team of legal experts to defend himself against the rape accusations leveled by Kathryn Mayorga of Las Vegas. The star soccer player's Portuguese lawyer Carlos Osório de Castro, who has worked as Ronaldo's legal advisor for years, travelled to the United States and assembled a team of lawyers who have been tasked with developing a defense strategy.

The allegations against Ronaldo were first reported on by DER SPIEGEL. In 2017, the German newsmagazine reported on an out-of-court settlement between Ronaldo and the alleged victim Kathryn Mayorga. Two weeks ago, Mayorga, 34, went public with her allegations against Ronaldo for the first time. She claims he raped her in a Las Vegas hotel in June 2009.

In its story from two weeks ago, DER SPIEGEL quotes from documents in which Ronaldo's team - before negotiating the Settlement - asked the player about his version of the incident in Las Vegas. According to that report, Ronaldo described



doesn't say anymore that Mayorga protested and that Ronaldo apologized.

#### **New Lawyer, New Statement**

Following the publication of the DER SPIEGEL story on September 29, police in Las Vegas announced they were reopening the case. The officers stated that they would examine all evidence, including traces of DNA, which were secured in a hospital on the day of the alleged rape. The police would also like to hear Ronaldo's side of the story, as a spokesperson confirmed.

Mayorga's lawyer says that criminal defense attorney David Chesnoff claimed to be Ronaldo's legal representative for this case. On Wednesday night however, a new lawyer emerged publicly. The American attorney Peter S. Christiansen published a statement through Gestifute, the agency that represents Ronaldo. In this statement, Christiansen challenged the DER SPIEGEL coverage and claimed that "significant portions" of the documents were "altered and/or completely fabricated."

The statement would seem to indicate that Ronaldo's lawyers have decided to pursue a defense strategy that they have used in response to unfavorable news coverage several times. When DER SPIEGEL published its first story about the alleged rape and about the out-of-court settlement between Mayorga and Ronaldo in 2017, his advisors called the report "journalistic fiction." In Christiansen's most recent statement, however, he admits that the settlement exists and that Ronaldo agreed to it.

#### **"Unreliable" Information?**

When DER SPIEGEL revealed Ronaldo's tax fraud earlier this year, his legal representatives resorted to the same strategy, stating that the journalists were only able to base their story on "unreliable" information. Ronaldo denied that he had committed tax fraud. He has, however, since admitted his transgressions and paid millions in back-taxes to the Spanish government in order to avoid a possible prison sentence.

DER SPIEGEL is in possession of hundreds of documents from a variety of sources pertaining to the rape allegations that have been made against him. In a year and a half of research, those documents were examined and complemented by additional further research. All information was carefully vetted before publication.

#### **'Hard Work, Athleticism and Honor'**

Before publication, DER SPIEGEL informed Ronaldo's representatives about its research and granted them the opportunity to respond. At the time, they did not dispute the authenticity of the documents, which DER SPIEGEL referred to in its request for comment. The claim of "fabricated" documents was only now raised by Ronaldo's new lawyer, two weeks after publication.

In his statement, Mr. Christiansen points out that the out-of-court settlement was not an admission of guilt. He writes the following: "Far from any admission of guilt or any ulterior motive, Mr. Ronaldo was advised to privately resolve the allegations against him in order to avoid the inevitable attempts that are now being made to destroy a reputation that has been built upon hard work, athleticism and honor."

Ronaldo, Mr. Christiansen wrote, will not issue further comment and will leave "all legal matters to his attorneys here and in Europe." He is "confident that the truth

Further investigation in this case of alleged rape now rests with the local authorities. As of now, only Kathryn Mayorga and Cristiano Ronaldo know the truth about what happened in that night in June 2009. Ronaldo denies the rape accusation. The presumption of innocence applies to the football star.

By Rafael Buschmann, Andreas Meyhoff, Nicola Naber, Gerhard Pfeil, Antje Windmann, Christoph Winterbach and Michael Wulzinger

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October 3, 2018

Via Hand Delivery

Mr. Leslie Mark Stovall, Esq.  
Mr. Ross H. Moynihan, Esq.  
Ms. Larissa Drohobyczer, Esq.  
STOVALL & ASSOCIATES  
2301 Palomino Lane  
Las Vegas, Nevada 89107

Re: Mayorga v. Ronaldo  
Case No. A-18-781869

**NOT FOR PUBLICATION**

Dear Mr. Stovall, Mr. Moynihan, and Ms. Drohobyczer,

We have been authorized to represent the interests of Mr. Cristiano Ronaldo.

We understand that you are planning to have a press conference this afternoon at 3:00pm. Specifically, it has been reported that Ms. Drohobyczer advised the media that Ms. Mayorga will not be attending the press conference because "at this time she's emotionally fragile". The reporting provides that although Ms. Mayorga will not be present at the press conference "her legal representatives are still expected to provide additional details regarding her allegations."

To that end, we remind you of a Nevada lawyer's ethical obligations.

**Rule 3.6.** Trial Publicity provides:

(a) A lawyer who is participating or has participated in the investigation or litigation of a matter shall not make an extrajudicial statement that the lawyer knows or reasonably should know will be disseminated by means of public communication and will have a substantial likelihood of materially prejudicing an adjudicative proceeding in the matter.

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- page 2-

There is no question that your firm, and the lawyers identified in this letter, are participating in the above referenced Eighth Judicial District Court litigation. There is no question that holding a press conference is for the purpose of publishing extrajudicial statements. There is no question that conveying the type of information that the media is expecting to receive has a substantial likelihood of materially prejudicing the adjudicative process.

While it is a lawyer's responsibility to be familiar and comply with the Rules of Professional Conduct, we wanted to remind you of the same.

Mr. Ronaldo reserves all rights and remedies.

Sincerely,

CHESNOFF & SCHONFELD

  
David Z. Chesnoff, Esq.

  
Richard A. Schonfeld, Esq.



# EXHIBIT 15

**Ronald Harper Jr**

**From:** Norma McMahan  
**Sent:** Wednesday, November 14, 2018 1:53 PM  
**To:** ronald@lesstovall.com  
**Subject:** FW: Will Not Accept Service Case No. A-18-781869-C

[Norma@lpsnv.com](mailto:Norma@lpsnv.com) | [www.lpsnv.com](http://www.lpsnv.com)  
Thank you,

**Norma McMahan**

General Manager  
LEGAL PROCESS SERVICE  
724 S. 8th Street, Las Vegas, NV 89101  
702.471.7255 Ext: 504 | 702.471.7248 Fax

105 Mary Street, Reno, NV 89509  
775.323.7070 | 775.323.7072 Fax

**From:** Richard Schonfeld <[rschonfeld@cslawoffice.net](mailto:rschonfeld@cslawoffice.net)>  
**Sent:** Thursday, October 4, 2018 10:59 AM  
**To:** Norma McMahan <[norma@lpsnv.com](mailto:norma@lpsnv.com)>  
**Cc:** David Z Chesnoff <[dzchesnoff@cslawoffice.net](mailto:dzchesnoff@cslawoffice.net)>  
**Subject:** Will Not Accept Service Case No. A-18-781869-C

Dear Norma,

This email will document that our office advised you today that we are not authorized to accept service of the Complaint in case number A-18-781869-C for Mr. Ronaldo.

Sincerely,

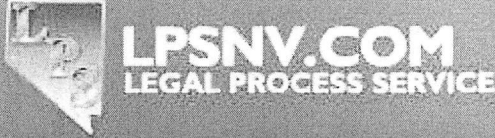
CHESNOFF & SCHONFELD

Richard A. Schonfeld, Esq.

# EXHIBIT 16

**Ronald Harper Jr**

**From:** Norma McMahan  
**Sent:** Wednesday, November 14, 2018 2:03 PM  
**To:** ronald@lesstovall.com  
**Subject:** Peter S. Christiansen



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Ronald, I called office of Peter S. Christiansen. They screened my call and after holding for a period of a few mins. put me through to his assistant's voice mail, Jonathan Crane(not sure of spelling). I left a message on the voice mail. I will be in touch as soon as I get a response to my message.



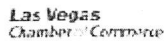


Thank you,

**Norma McMahan**

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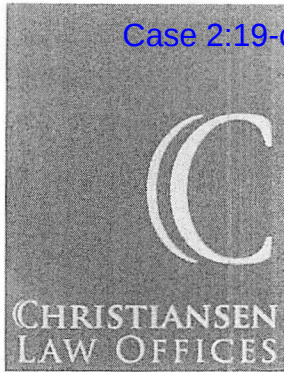
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PETER J. CHRISTIANSEN  
R. TODD TERRY  
KENDALL LEASCHER WORKS  
WHITNEY J. BARRETT  
KELLY A. PERDUE

TRIAL ATTORNEYS

November 26, 2018

*Via U.S. Mail and email: les@lesstovall.com*

Leslie Mark Stovall, Esq.  
Stovall & Associates  
2301 Palomino Lane  
Las Vegas, Nevada 89107

Re: *Ronaldo adv. Mayorga*; Case No. A-18-781869-C

Dear Mr. Stovall:

As you are undoubtedly aware given your past correspondence, Christiansen Law Offices has been retained to represent Cristiano Ronaldo with respect to allegations being made by your client, Kathryn Mayorga. It is my understanding that last week, a process server contacted my office to inquire whether we could accept service of a Complaint in the above-referenced matter. Please be advised that we declined to do so as we do not have authority to accept service on behalf of Mr. Ronaldo. With that being said, your office will need to proceed with attempting to have him served pursuant to applicable international law.

In the event you believe you have properly effectuated service, we hereby request that you immediately inform our office and provide confirming documentation to that end. Additionally, given that you are on notice that Mr. Ronaldo is represented by counsel, you are further advised to notify our office directly prior to filing any notice of intent to take default, default or application for default judgment. *See* NRCP 55 (requiring at least three-day's notice to counsel prior to any hearing on an application for default judgment); *Milton v. Gesler*, 107 Nev. 767 (1991)). Should you have questions regarding any of the foregoing, please do not hesitate to contact me directly.

Sincerely,

CHRISTIANSEN LAW OFFICES



PETER S. CHRISTIANSEN, ESQ.



# EXHIBIT 18

## Money

# Cristiano Ronaldo Is Worth a Staggering \$400 Million. Here's How the Soccer Star Spends His Millions

By ALIX LANGONE Updated: July 10, 2018 4:48 PM ET | Originally published: June 14, 2018

Cristiano Ronaldo is not only one of the most famous soccer players in the world, he's also one of the richest.

The 33-year-old soccer star, who is a forward on Spain's Real Madrid team and also plays for Portugal's national team, has a massive net worth of around \$400 million — and was considered the highest-paid athlete in the world for the last two years until boxer Floyd Mayweather dethroned him this year. Ronaldo is now the third-highest paid athlete thanks to his \$61 million salary and bonuses as well as the \$47 million in he earns in endorsements, according to Forbes.

Ronaldo made waves in July when he announced he was leaving Real Madrid to transfer to Italian Club Juventus, which is reportedly paying him \$131.5 million for a four-year deal. The deal breaks the previous Series A league record set by the team two years ago when Juventus paid \$99 million to Italian Club Napoli for the player Gonzalo Higuain, according to the Associated Press.

Just before his first match of the 2018 World Cup, Ronaldo was reportedly fined \$21.8 million for tax evasion, according to Spanish newspaper *El Mundo*, and there is some speculation that the hefty fines imposed on him by Spain may be part of the reason he is leaving Real Madrid for the Italian club team. Living in Italy could benefit Ronaldo because “a new law caps tax on income generated from abroad at 100,000 euros (\$117,000) per year for residents who have paid their taxes in other countries for at least nine of the last 10 years,” the Associated Press reported.

And Ronaldo isn't just rich. He's also quite popular, maintaining more than 322 million social media followers, with 129 million followers on Instagram, 122 million on Facebook and almost 74 million followers on Twitter. He recently shared a photo on Instagram showing his Portugal team on their way to Russia for the 2018 World Cup.

**cristiano**

150m followers

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**cristiano**

On our way to Russia! 🇵🇹

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Here's what we know about how Ronaldo makes and spends his millions:

## Soccer star

While he is now one of the richest athletes in the world, Ronaldo didn't always have money. He was born and raised in Madeira, Portugal, but moved to Lisbon when he was 11 to attend a prestigious sports academy, he wrote in an essay last year for The Players' Tribune. At the time, he recalled getting homesick regularly, but his parents could only afford to visit him every four months. He said playing soccer was the only outlet he had to keep himself from feeling lonely.

"Football kept me going," he wrote.

Ronaldo kicked off his professional soccer career when he was 17 and signed with Manchester United, a team he said had always dreamt of playing for, and ended up winning numerous championship trophies for his team. Over the course of his career, Ronaldo has won dozens of awards and broken dozens of records — with some people saying he is the greatest soccer player of all time. He has won FIFA's Player of the Year award five times, and is tied with Lionel Messi for receiving the honor five times. Ronaldo was on the winning team when Portugal won the European Championship in 2016, but he has not won a World Cup championship yet. He's also scored 450 goals with Real Madrid alone, the most ever for a single player on that team.

In 2017, Ronaldo made \$93 million from his soccer salary and endorsement deals, *Forbes* reported. Ronaldo's current contract with Real Madrid is for \$50 million a year through 2021. And if Portugal wins the 2018 World Cup, the Associated Press reports that the team will get \$38 million in prize money from FIFA, though it's unclear how much each player gets.

## Ronaldo's endorsement deals

Ronaldo is one of the few athletes who has a lifetime contract with Nike — Michael Jordan and LeBron James are the only other two athletes with the same deal — worth around \$1 billion, which he signed in 2016.



He has so many endorsement deals and sponsorships — Tag Heuer, Herbalife, KFC, EA Sports, American Tourister to name a few — that it's nearly impossible to keep track of all of them, according to *Forbes*. One of Ronaldo's most unusual partnerships is with Egyptian Steel, a steel company trying to gain market share in Egypt.

The Real Madrid player has his own clothing line called CR7 (his Real Madrid jersey number is 7), which includes everything from underwear and fragrances to kids clothing. He even has hotels branded under his CR7 Line through the Pestano Lifestyle Hotels company. *Forbes* reports that Ronaldo also has plans to open restaurants in Brazil.

And aside from his endorsements and sponsorship deals, he also has a free smartphone app called Cristiano Ronaldo: Kick'n'Run, as well as a selfie app that allows you to photoshop Ronaldo into your photos. He even has his own museum in his home country of Portugal called the Museu CR7.

*Forbes* estimated Ronaldo's social media presence generates some \$176 million value for his sponsors.



cristiano

150m followers

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4,120,891 likes

cristiano

PT 🇵🇹 🇪🇺

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## Ronaldo's need for speed and luxury

Ronaldo likes to splurge a little as well — the soccer star has a serious car collection. He owns a Maserati and a Lamborghini Aventador, which is valued at around \$300,000. He used to own a \$320,000 Ferrari which he crashed in 2009, Business Insider reported. Not to mention his \$3 million Bugatti. In addition to those high-end luxury cars, he also reportedly has an Aston Martin, a Rolls-Royce and a Bentley in his collection.



He also owns numerous houses, including a \$5.6 million villa in Madrid. In 2015, he paid \$18.5 million for an apartment in Trump Tower in New York City, which resulted in 7,000 fans signing a petition asking him to move out last year.



cristiano

150m followers



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6,043,573 likes

cristiano

Os meus bebés Eva e Mateo cumprem hoje o seu primeiro aniversário! Parabéns meus queridos filhos! 🍰🎂👶👶

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Ronaldo has a big family — he's the father of four children. He has an 7-year-old son, Cristiano, Jr., and twins Mateo and Eva Marie, who just turned a year old. He also has a 6-month-old daughter named Alana with his current girlfriend, Georgina Rodriguez. Before Rodriguez, Ronaldo dated model Irina Shayk, who is now engaged to Bradley Cooper, for five years.

## **Ronaldo's charitable side**

The world-famous soccer player doesn't make just money — he donates it, too.

Ronaldo is involved with a slew of charities including the child refugee organization Save the Children, as well as BeThe1Donor.com, which helps raise awareness for people to donate blood, according to ESPN. He's also donated towards fighting adolescent cancer in Portugal, and once paid for a 10-year-old fan's brain surgery, according to Business Insider.